

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LAMBETH MAGNETIC STRUCTURES, LLC, Plaintiff, v. SEAGATE TECHNOLOGY (US) HOLDINGS, INC., and SEAGATE TECHNOLOGY LLC, Defendants.	Civ. No. 2:16-cv-00538-CB
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SEAGATE’S UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Defendants Seagate Technology (US) Holdings, Inc., and Seagate Technology LLC (“Seagate”) file this Unopposed Motion for Leave to File Under Seal Seagate’s Motion for Summary Judgment, along with its brief, statement of facts and any exhibits thereto:

1. On March 17, 2017, this Court adopted a Stipulated Protective Order (Dkt. Nos. 59, 70), which provided, *inter alia*, that the parties and non-parties could designate certain documents and things as “Protected Information” because of their confidential, sensitive business nature.

2. Seagate intends to rely upon documents and things produced by parties and non-parties to this litigation, including documents designated as “Confidential Information,” “Confidential Attorney Eyes Only Information,” and “Confidential Outside Counsel’s Eyes Only Information” under the Protective Order. Based on these designations, these documents contain highly confidential, sensitive information that is not publicly known. To comply with the Protective Order regarding the Protected Information, Seagate moves for permission to file under

seal its Motion for Summary Judgment, corresponding brief, statement of facts and any exhibits thereto containing confidential information. Seagate will file a redacted version as appropriate of its Motion for Summary Judgment, corresponding brief, statement of facts and any accompanying exhibits that are filed under seal.

3. Seagate informed Plaintiff Lambeth Magnetic Structures, LLC (“LMS”) of this motion, and LMS indicated that it does not oppose this motion.

4. A proposed Order is attached.

WHEREFORE, Seagate respectfully requests that this Motion be granted, and that Seagate be permitted to file its Motion for Summary Judgment, corresponding brief, statement of facts and any exhibits thereto containing confidential information under seal.

Dated: October 9, 2018

By: /s/ Eric G. Soller
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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of October, 2018, I electronically filed the foregoing **SEAGATE'S UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL** with the Clerk of the Court using the CM/ECF system which sent notification to all counsel of record.

By: /s/ Eric G. Soller
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